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VIA ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 8/11/25

The motion for a provisional seal is GRANTED. The Clerk of Court is respectfully directed to maintain the viewing restrictions at ECF Nos. 234-35. If KSNY seeks to permanently seal the information, KSNY is directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by **September 30, 2025**.

Re: Coach IP Holdings, LLC, et al. v. ACS Group Acquisitions LLC, et al.,
No. 1:23-cv-10612 (LGS) (VF)

Dear Judge Figueredo:

We represent Defendants Vinci Brands LLC ("**Vinci**") and Onward Brands LLC ("**Onward**") in the above-referenced action. Vinci hereby respectfully moves this Court pursuant to Rule 1(g)(2) of Your Honor's Individual Rules for an Order provisionally sealing the highlighted portions of the following documents:

1. Exhibit 2 to the August 8, 2025 reply declaration of William H. Mack (the "**Mack Reply Declaration**"); and
2. Vinci's reply memorandum of law in further support of its motion for leave to amend its answer with counterclaims to the second amended complaint (the "**Reply Memorandum of Law**").

On February 7, 2024, Hon. Lorna G. Schofield, U.S.D.J. so-Ordered certain stipulated confidentiality agreements (the "**Protective Orders**") in the actions captioned *Kate Spade LLC et al. v. Vinci Brands LLC et al.*, No. 1:23-cv-05409-LGS-VF and *Vinci Brands LLC v. Kate Spade LLC et al.*, No. 1:23-cv-05138-LGS-VF (the "**Related Actions**"). Pursuant to the Protective Orders, parties are permitted to mark documents produced in discovery as "Confidential" or "Highly Confidential – Attorney's Eyes Only."

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United States Magistrate Judge
August 8, 2025
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Kate Spade LLC ("**KSNY**"), as part of its production of documents in connection with the Related Actions, designated Exhibit 2 to the Mack Reply Declaration as "Confidential." That designation has not been changed voluntarily or by Order of this Court. In addition, the Reply Memorandum of Law includes quotations taken from Exhibit 2 to the Mack Reply Declaration. Accordingly, Vinci hereby respectfully requests that this Court permit Vinci to file under seal the highlighted portions of Exhibit 2 to the Mack Reply Declaration and the Reply Memorandum of Law.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "W.H. Mack", written in a cursive style.

William H. Mack

WHM/

cc: All Counsel of Record (via ECF)